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inatory rate in favor of the logs shipped to the mill from which the product is made.

Carriers—Bill of Lading—Estoppel.—That a carrier may be estopped, even as against a bona fide holder for value, to deny the validity of a bill of lading issued by its agent, on the ground that the goods were never delivered to it for shipment, is denied in *Roy & Roy v. Northern P. R. Co.* (Wash.) 6 L. R. A. (N. S.) 302.

Charities—Bequests—Exemption from Taxation.—A trust fund created for the propagation of the religious belief of a particular sect is held, in *Com. ex rel. Albritton v. Thomas* (Ky.) 6 L. R. A. (N. S.) 320, not to be exempt from taxation under a clause of the Constitution exempting "purely public charities," where the same section specifies the religious property that shall be exempt, and other sections absolve citizens from contributing to the support of any religious sect, and provide that no money raised for educational purposes shall be used in aid of any church.

Fellow Servants—Rule of Decision—Law of Forum.—In *Root v. Kansas City S. R. Co.* (Mo.) 6 L. R. A. (N. S.) 212, it is held that the courts of a state in which a section foreman on a railroad is held not to be a fellow servant of a brakeman will not, in determining the liability of a railroad company for injury to a brakeman through the negligence of a foreman in another state, assume that the courts of the latter would hold that they were fellow servants, merely because its decisions had tended in that direction, but, in the absence of direct decision, will establish their own rule.

Constitutional Law—Delegation of Legislative Power.—A statute prescribing punishment for violation of a regulation of the state board of health is held, in *Pierce v. Doolittle* (Iowa) 6 L. R. A. (N. S.) 143, not to be unconstitutional, on the theory that legislative power to create crimes is thereby delegated to such board.

Constitutional Law—Sale of Nonintoxicants.—Forbidding the keeping for sale, for tippling purposes, or for a beverage, of cider which is in fact unfermented and nonintoxicating, is held, in *State v. Frederickson* (Me.) 6 L. R. A. (N. S.) 186, not to violate the constitutional rights of the owner.

Constitutional Law—Liability of Landlords.—A statute making the owner of premises liable for water and light furnished by a municipality to a tenant is held, in *East Grand Forks v. Luck* (Minn.) 6 L. R. A. (N. S.) 198, not to be unconstitutional as a taking of property without due process of law, or as causing one person to pay for the debts of another.